

Hearing Date: January 14, 2009
Time: 10:00 a.m.

BAKER & HOSTETLER LLP

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*Attorneys for Irving H. Picard, Esq., Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF MOTION OF TRUSTEE'S MOTION
FOR ENTRY OF PROTECTIVE ORDER**

PLEASE TAKE NOTICE that a hearing on the attached motion (the "Motion") of Irving H. Picard, Esq., as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, will be

held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, on January 14, 2009 at 10:00 a.m. (EST), or as soon thereafter as counsel may be heard, at the United States Courthouse, One Bowling Green, Courtroom 623, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the Motion (“Objections”), shall (i) be in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders, (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefor, (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, One Bowling Green New York, New York 10004 and (v) served upon Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc Hirschfield, so as to be received no later than **4:00 p.m. on January 7, 2009**.

Dated: New York, New York
December 18, 2009

By: /s/ Marc Hirschfield
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